

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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| UNITED STATES OF AMERICA, |) | |
| |) | |
| |) | |
| |) | |
| v. |) | Criminal Action No. 1:15-23-RGA |
| |) | |
| WILMINGTON TRUST CORPORATION, |) | |
| DAVID R. GIBSON, |) | |
| ROBERT V.A. HARRA, |) | |
| WILLIAM NORTH, and |) | |
| KEVYN RAKOWSKI, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT WILMINGTON TRUST CORPORATION’S
MOTION TO COMPEL**

Defendant Wilmington Trust Corporation respectfully moves this Court to order the government to expand the scope of its review under Fed. R. Crim. P. 16 and *Brady v. Maryland*, 373 U.S. 83 (1963), to encompass certain documents and information within the Board of Governors of the Federal Reserve System and the Federal Reserve Bank of Philadelphia. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Dated: September 15, 2017

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Respectfully submitted,

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